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SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Spartanburg County
Court of Common Pleas
Grace Gilchrist Knie, Circuit Court Judge

Case No. 2022-CP-42-01163
Appellate Case No. 2023-001612

Timothy Hutley, Guardian for Jane Doe,

Respondent,

v.

THI of South Carolina at Magnolia Manor Inman, LLC,
THI of Baltimore, Inc., THI of South Carolina, LLC,
Hunt Valley Holdings, LLC, THI of South Carolina at Inman, LLC,
Murray Forman, and Kathy Scroggs, Individually,

Defendants.

Of which THI of South Carolina at Magnolia Manor Inman, LLC,
THI of Baltimore, Inc., THI of South Carolina, LLC, and
Hunt Valley Holdings, LLC, are the

Appellants.

MOTION TO WITHDRAW AS COUNSEL OF RECORD

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
James D. Gandy III (SC Bar No. 11925)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellants

Appellants, THI of South Carolina at Magnolia Manor Inman, LLC, THI of Baltimore, Inc., THI of South Carolina, LLC, and Hunt Valley Holdings, LLC are represented in this matter by Clement Rivers, LLP (“CR”). Among the CR attorneys who have appeared in the matter on behalf of Appellants is **Gaillard T. Dotterer, III**. Mr. Dotterer has left CR to practice with another law firm. Accordingly, the other CR attorneys who have appeared on behalf of Appellants in this matter – namely, **Stephen L. Brown, D. Jay Davis, Jr., James D. Gandy, and Russell G. Hines, all of whom shall remain counsel of record for Appellants** – joined by and with the consent of Mr. Dotterer (as evidenced by his signature below, his signature block reflecting his new firm), hereby move this Honorable Court to allow **Mr. Dotterer** to **withdraw** as counsel of record for Appellants.

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
James D. Gandy III (SC Bar No. 11925)
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25 Calhoun Street, Suite 400
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(843) 720-5488
Attorneys for Appellants

Charleston, South Carolina

June 3, 2024

I JOIN AND CONSENT:

By: s/Gaillard Townsend Dotterer, III
Gaillard Townsend Dotterer, III
BYBEE & TIBBALS, LLC
880 Johnnie Dodds Blvd., Suite 2
Mt. Pleasant, SC 29464
(843) 881-1623

Mt. Pleasant, South Carolina

June 3, 2024

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PROOF OF SERVICE

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **MOTION TO WITHDRAW AS COUNSEL OF RECORD** was served on Respondent on June 3, 2024, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

C. Daniel Pruitt, Esquire
danlaw@bellsouth.net
dan@danpruittlaw.com
300 Pettigru Street
Greenville, SC 29601
Attorney for Respondent

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)
Attorneys for Appellants

Charleston, South Carolina

June 3, 2024

From: [Bell, Pollyana \(Polly\)](#)
To: ["danlaw@bellsouth.net"](mailto:danlaw@bellsouth.net); [Dan Pruitt](#)
Cc: [Justman, Aimee](#); [Hines, Russell](#); gdotterer@bybeetibbals.com
Subject: Hutley v. THI; Appellate Case No. 2023-001612 (CR 210889)
Date: Monday, June 3, 2024 2:14:07 PM
Attachments: [Motion for Extension - initial reply brief.pdf](#)
[Motion to withdraw counsel .pdf](#)
[image001.png](#)

Enclosed please find Appellants' Motion for Extension of Time to File/Serve their Initial Reply Brief and Motion to Withdraw as Counsel of Record for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell
Project Assistant
Commercial Litigation Practice Group
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